



Tom.Perina@CH2M.com  
06/01/2005 08:11 PM

To Christopher Lichens/R9/USEPA/US@EPA  
cc  
bcc  
Subject off-property sampling rationale

History:  This message has been replied to.

Chris,

the rationale for off-property sampling can be stated as follows:

The extent of the soil contamination associated with the former Omega property needs to be characterized. In the absence of other (i.e., other than the former Omega Chemical property) sources, the contaminant concentrations in soils are expected to decrease away from the Omega property. Soil samples collected at increasing distances from the Omega property (and at multiple depths) would then be used to estimate the extent of the contamination.

Soil and soil-gas contamination associated with other sources can be recognized from multiple lines of evidence, such as:

- 1) Documented release of contaminants at an adjacent property.
- 2) Contaminant concentrations increasing away from the Omega property.
- 3) Occurrence of contaminants not associated with the Omega property in off-property samples. In such case, however, there may be co-mingled contamination from multiple sources (Omega and other).

Off-property sampling is necessary to make these assessments because it is possible that contaminants were released at multiple locations and at various times and quantities at the Omega property.

Unless the evidence of other sources is already available, the investigation should proceed as outlined above, i.e., by collecting samples at increasing distances away from the Omega property. The presence of contamination from other sources can be recognized from the data.

Let's discuss tomorrow.  
Tom